

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 112
botto@idahoconservation.org

RECEIVED
2021 JUN 30 PM 12:45
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. IPC-E-21-19
INDUSTRIAL CUSTOMERS OF)	
IDAHO POWER'S PETITION FOR)	PETITION TO INTERVENE OF THE
AN ORDER TO SHOW CAUSE)	IDAHO CONSERVATION LEAGUE
)	
)	
)	

COMES NOW the Idaho Conservation League ("ICL") and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 345-6933 x 112
botto@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. Idaho Conservation League claims a direct and substantial interest in this proceeding as a customer and on behalf of our members who are customers of Idaho Power. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. ICL's Boise headquarters is a Schedule 9 Idaho Power customer and our Ketchum field office is a Schedule 7 customer. ICL and our members have a direct and substantial interest in ensuring compliance with prior Commission orders regarding the acquisition of new energy resources as this docket is a necessary precursor to future proceeding that will impact customer rates. ICL will respond to the Industrial Customers of Idaho Power's Petition as well as any response filed by Idaho Power or the Commission Staff and thus will not unduly broaden the issues.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 30th day of June 2021.

Respectfully submitted,

/s/ Benjamin J Otto

Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June 2021, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Benjamin J Otto
Idaho Conservation League

Electronic mail only (See Order 34781):

Idaho Public Utilities Commission

Jan Noriyuki, Secretary

secretary@puc.idaho.gov

Karl Klien, Director Legal Division

Deputy Attorney General

Idaho Public Utilities Commission

Karl.klien@puc.idaho.gov

Idaho Power

Donovan Walker, Senior Counsel

Idaho Power Company

dwalker@idahopower.com

dockets@idahopower.com

Industrial Customers of Idaho Power

Peter J. Richardson

Richardson Adams, PLLC

peter@richardsonadams.com

Dr. Don Reading

dreading@mindspring.com